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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DANIEL ROBBINS,

Petitioner,

vs.

JERRY HOWELL, *et al.*,

Respondent(s).

Case No. 2:19-cv-02153-APG-VCF

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO FILE
ANSWER TO FIRST AMENDED PETITION
FOR WRIT OF HABEAS CORPUS (ECF NO.
20)**

(SECOND REQUEST)

Respondents move this Court for an enlargement of time of 14 days from the current due date of November 24, 2021, up to and including December 8, 2021, in which to file their Reply in Support of Motion to Dismiss the First Amended Petition for Writ of Habeas Corpus (ECF No. 35). This Motion is made pursuant to Fed. R. Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel.

This is the second enlargement of time sought by Respondents, and the request is brought in good faith and not for the purpose of delay.

DATED: November 24, 2021.

Submitted by:

AARON D. FORD
Attorney General

IT IS SO ORDERED:

By: /s/ Jaimie Stilz
Jaimie Stilz (Bar. No. 13772)
Deputy Attorney General

Dated: November 30, 2021

DECLARATION OF JAIMIE STILZ

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, JAIMIE STILZ, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada and I am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I am assigned to represent Respondents in *Daniel Robbins v. Jerry Howell, et al.*, Case No. 2:19-cv-02153-APG-VCF, and as such, have personal knowledge of the matters contained herein.

2. This is my second request for an extension to file the Answer, and the instant Motion is made in good faith and not for the purpose of delay.

3. The Answer to the First Amended Petition for Writ of Habeas Corpus (ECF No. 20) is currently due on November 24, 2021.

4. I am unable with due diligence to timely complete the Answer herein. I have been contending with significant medical issues. I have been diligently striving to resolve and/or work around these issues but they have significantly impacted the ability to obtain and sort all necessary pleadings and records. This in turn has hindered my ability to complete the Answer in a timely fashion, thus necessitating an extension.

5. In seeking this extension, I am taking into consideration additional obligations and deadlines for both myself and my supervising senior colleague.

6. I have spoken to counsel for Robbins, and she does not oppose this request.

7. Based on the foregoing, I respectfully request an enlargement of time of 14 days, up to and including December 8, 2021, to file the Answer to the First Amended Petition for Writ of Habeas Corpus (ECF No. 20).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 24th day of November, 2021.

/s/ Jaimie Stilz
Jaimie Stilz (Bar No. 13772)
Deputy Attorney General

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Office of the Nevada Attorney General and that on this 24th day of November, 2021, I served a copy of the foregoing **UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE ANSWER TO FIRST AMENDED PETITION FOR WRIT OF HABEAS CORPUS (ECF NO. 20)**, by U.S. District Court CM/ECF electronic filing, to:

Lisa A. Rasmussen, Esq.
THE LAW OFFICES OF KRISTINA
WILDEVELD & ASSOCIATES
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Las Vegas, NV 89104
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/s/ J. Stilz
An employee of the Office of the Attorney General